

Brown, Katherine

From: Brown, Katherine
Sent: Thursday, April 18, 2013 1:00 PM
To: Fordham, Tami
Cc: Godsey, Cindi; Shaw, Hanh
Subject: FW: TTAU Hot Topic - Reissuance of Cook Inlet GP for Oil and Gas

This is that other summary of tribal requests I was thinking of.

From: Katherine Brown [mailto:Brown.Katherine@epamail.epa.gov]
Sent: Thursday, April 18, 2013 11:49 AM
To: Brown, Katherine
Subject: Fw: TTAU Hot Topic - Reissuance of Cook Inlet GP for Oil and Gas

----- Forwarded by Katherine Brown/R10/USEPA/US on 04/18/2013 11:48 AM -----

▼ Katherine Brown---12/21/2012 11:03:44 AM---Hoping you can add this to TTAU's hot topics. Sorry it's late, I've been out really sick. Reissuanc

From: Katherine Brown/R10/USEPA/US
To: Amy LeFeat/R10/USEPA/US@EPA, Kit Brandt/R10/USEPA/US@EPA, Clover Muters/R10/USEPA/US@EPA,
Cc: Cindi Godsey/R10/USEPA/US@EPA, Hanh Shaw/R10/USEPA/US@EPA, Tami Fordham/R10/USEPA/US@EPA, Sally Thomas/R10/USEPA/US@EPA, Linda Anderson-Carnahan/R10/USEPA/US@EPA, John Herbst/R10/USEPA/US@EPA, Keith Cohon/R10/USEPA/US@EPA
Date: 12/21/2012 11:03 AM
Subject: TTAU Hot Topic - Reissuance of Cook Inlet GP for Oil and Gas

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Reissuance of Cook Inlet GP for Oil and Gas- Teleconference for Tribes

R10 held an informational teleconference for Cook Inlet tribes on re-issuance of the NPDES General Permit for Oil and Gas exploration activities in Cook Inlet, Alaska on Tuesday December 18. OW Project Lead/ Permit writer Cindi Godsey led the call and Katherine Brown from TTAU facilitated. 9 representatives of 7 Cook Inlet tribal governments participated. Cindi gave an overview of the action and the permit and answered questions. EPA plans to reissue only the exploration components of a NPDES General Permit for federal waters, but to do so in conjunction with a state issuance of an APDES General Permit for exploration discharges in state waters. The expired 2007 NPDES General Permit's discharge limits for existing production facilities (all of which are in state waters) are still in litigation. Coverage for existing production facilities that reapplied in a timely manner has been administratively extended. Future issuance and administration of both exploration and existing production facility permits for state waters will be by ADEC. Requests from tribal representatives on the call included:

- extending consultation period given American and traditional holidays that run through January;
- having a joint EPA-tribal meeting and/or consultation at the Alaska Forum on the Environment;
- sharing Ocean Discharge Criteria report and ESA Biological Evaluation report promptly;
- considering and incorporating changes in the Inlet and in endangered species since the last permit;
- considering and incorporating fish consumption, including EPA's 2003 and Seldovia's 2012 data;
- considering and incorporating results of contaminant monitoring conducted since 2007;
- considering tribal fish consumption and the impacts of cuttings and fluids discharges carefully;
- considering combined/ cumulative impacts of all discharges on tribal health;
- including sensitive areas (Port Graham and Nanwalek) from Coastal Zone Management Plan as areas meriting special

attention; and

- having another informational call after the draft permit is noticed.

OW Oil and Gas Sector lead Hanh Shaw has scheduled an internal call to discuss the permit reissuance, tribal consultation, and the tribes' requests Tuesday January 8. Katherine Brown and Tami Fordham from TTAU will participate.